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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of

**1998 Biennial Regulatory Review –  
Amendment of Parts 2, 25 and 68 of the  
Commission's Rules to Further Streamline  
the Equipment Authorization Process for  
Radio Frequency Equipment, Modify the  
Equipment Authorization Process for  
Telephone Terminal Equipment, Implement  
Mutual Recognition Agreements and Begin  
Implementation of the Global Mobile Personal  
Communications by Satellite (GMPCS)  
Arrangements**

GEN Docket No. 98-68

**COMMENTS OF CISCO SYSTEMS, INC.**

**CISCO SYSTEMS, INC.**

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## SUMMARY

Cisco applauds the Commission's continuing efforts to reduce the regulatory burdens associated with certification and registration of communications equipment. Nevertheless, the proposal to permit private Telecommunications Certification Bodies ("TCBs") to authorize equipment is a half measure that should not be adopted. Rather than inserting new private entities into the authorization process, the Commission should expand its current self-certification programs to other types of regulated equipment.

The Commission's proposal to permit authorization by TCBs has many potential drawbacks but will not provide manufacturers with any significant advantages. The use of TCBs will distance the Commission from the authorization process and insert potential bias into the system. Moreover, certain elements of the proposed TCB regime, such as audits of previously-approved equipment, are unworkable. If the Commission nevertheless permits certification and registration by TCBs, the Commission must maintain the existing certification and registration process as an option for equipment approval, as proposed in the Notice. Maintaining the availability of the existing process will somewhat mitigate the risks of a TCB regime.

Rather than taking the half step of authorizing TCBs, it would be considerably more beneficial for the Commission to expand the existing Declaration of Conformity ("DoC") regime to additional types of equipment, including Part 68 terminal devices. Expanding the availability of the DoC process will reduce regulatory burdens on equipment manufacturers without creating any significant risk of noncompliance.

The Commission should encourage participation by the United States in Mutual Recognition Agreements ("MRAs"), such as the European MRA. MRAs that follow the model of the European MRA will make it easier for equipment manufacturers to compete in the global marketplace, which will benefit innovative manufacturers and consumers. The Commission also should take this opportunity to permit electronic filing of Part 68 registration applications.

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**COMMENTS OF CISCO SYSTEMS, INC.**

**I. INTRODUCTION**

Cisco Systems, Inc. ("Cisco"), by its attorneys, hereby submits these comments in response to the Commission's Notice of Proposed Rulemaking in the above-referenced matter.<sup>1/</sup> In the Notice, the Commission requested comment on its proposal to permit private sector approval of equipment that remains subject to Commission approval.<sup>2/</sup>

Cisco submits that the Commission should not adopt half measures. Rather than inserting new entities into the authorization process, as proposed in the Notice, the Commission should expand its current self-certification programs to other types of regulated equipment.

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<sup>1/</sup> See 1998 Biennial Regulatory Review – Amendment of Parts 2, 25 and 68 of the Commission's Rules, 63 Fed. Reg. 31685 (1998) (to be codified at 47 C.F.R. pts. 2, 25 and 68) (released May 18, 1998) (the "Notice").

<sup>2/</sup> *Id.* ¶ 1.

Moreover, if the Commission does retain its equipment certification requirements, the Commission should maintain full responsibility for certification and registration of such equipment. The Commission also should encourage participation by the United States in Mutual Recognition Agreements ("MRAs") because MRAs promote bilateral market access and promote competition in the provision of telecommunications products and equipment.

As a leading manufacturer of equipment that must comply with the Commission's certification and registration rules, Cisco has a direct interest in this proceeding. Although Cisco applauds the Commission's efforts to reduce the regulatory burdens associated with certification and registration of communications equipment, it believes that the proposed approach is misguided. Consistent with the Commission's efforts to minimize the burden of its equipment certification and registration programs on equipment manufacturers, the Commission should expand the applicability of its Declaration of Conformity ("DoC") regime, particularly to non-radio terminal equipment subject to Part 68.

If the Commission nevertheless retains its current approval requirements, it should not adopt its proposal to permit private parties to approve equipment. As Cisco demonstrates below, the Commission's proposal is problematic and, in some respects, unworkable. Thus, the Commission can best reduce regulatory burdens on equipment manufacturers by simply expanding the applicability of the DoC to other types of equipment.

## **II. BACKGROUND**

On April 2, 1998, the Commission simplified the equipment authorization rules, deregulated the authorization requirements for certain types of equipment and began

implementation of an electronic filing system for equipment authorization applications.<sup>3/</sup>

However, the Commission maintained the certification requirements for certain types of products, including mobile radio transmitters, unlicensed radio transmitters and scanning receivers, arguing that these products required closer regulatory oversight to protect against radio frequency.<sup>4/</sup> Because the Commission maintained its certification procedures for certain products, it now seeks to reduce the regulatory burdens associated with obtaining approval from the Commission via certification.<sup>5/</sup>

In the Notice, the Commission proposes to allow parties other than the Commission to certify equipment.<sup>6/</sup> The Notice suggests that private organizations termed "Telecommunications Certification Bodies" ("TCBs") be created as an alternative to certification by the Commission.<sup>7/</sup> The Commission also proposes qualification criteria for prospective TCBs, including requirements that the TCB be impartial and knowledgeable.<sup>8/</sup>

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<sup>3/</sup> See Amendment of Parts 2, 15, 18 and Other Parts of the Commission's Rules to Simplify and Streamline the Equipment Authorization Process for Radio Frequency Equipment, *Report and Order*, ET Docket No. 97-94, released April 16, 1998 ("*Equipment Authorization Order*"). In its *Equipment Authorization Order*, the Commission simplified the existing equipment authorization process by eliminating the notification procedure, combining the type acceptance and certification procedures, which require Commission approval (adopting the term "certification" for the new combined process) and expanding the applicability of the self-approval procedures (verification and Declaration of Conformity). *Id.*

<sup>4/</sup> Notice, ¶ 11.

<sup>5/</sup> *Id.* ¶ 6.

<sup>6/</sup> See *id.*, ¶ 11.

<sup>7/</sup> *Id.*

<sup>8/</sup> *Id.* ¶ 12.

In addition to the certification rules, the Commission has Part 68 registration rules that apply to terminal equipment connected to the public switched telephone network.<sup>9/</sup> These registration requirements were adopted to facilitate competition in the telecommunications equipment industry and protect the public telecommunications network from harm from telecommunications terminal equipment.<sup>10/</sup> In the Notice, the Commission requests comment on whether it should permit TCBs to also perform Part 68 registration activities without direct Commission supervision.<sup>11/</sup> As shown below, the TCB proposal is much less desirable than the alternative of expanding the availability of the DoC program.

### **III. THE COMMISSION SHOULD EXPAND ITS APPLICATION OF THE DECLARATION OF CONFORMITY REGIME.**

The TCB proposal is, in many ways, a half measure. It distances the Commission from the authorization process but, as shown below, will not provide manufacturers with significant advantages. It would be considerably more beneficial to expand the existing DoC regime to additional types of equipment, including Part 68 terminal devices.

In the Notice, the Commission sought comment on its tentative conclusion that further relaxation of its certification requirements was undesirable, suggesting that certain products required closer oversight due to a higher risk of noncompliance, the potential to create

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<sup>9/</sup> See generally 47 C.F.R. pt. 68 (1997).

<sup>10/</sup> Notice, ¶ 4.

<sup>11/</sup> *Id.* ¶¶ 22-24.



significant interference to other communications services and the risk of radio frequency exposure.<sup>12/</sup> These concerns, however, are speculative at best.

Indeed, the Notice provides no evidence for the concerns it describes, especially with respect to non-radio terminal equipment subject to Part 68 of the Commission's rules. Non-radio terminal equipment does not create any risk of radio frequency exposure. It also is not evident how non-radio terminal equipment could create significant interference to other communications services.

Manufacturers of terminal equipment subject to Part 68 also have a well-established history of compliance.<sup>13/</sup> Indeed, manufacturers of terminal equipment have strong incentives to comply with the rules contained in Part 68. Non-compliant terminal equipment may not operate correctly, thereby generating customer complaints and hurting the marketability of the equipment. For instance, Part 68 specifies the parameters necessary to generate a telephone ring.<sup>14/</sup> Terminal equipment that does not meet these parameters might not generate a ring when a call is received by the equipment or might do so only intermittently. Similarly, terminal equipment with non-compliant jacks could not be connected to the telephone network.<sup>15/</sup> Thus, it is in the manufacturer's best interest to produce only compliant terminal equipment.

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<sup>12/</sup> *Id.* ¶ 11.

<sup>13/</sup> *See* Declaration of James Lambert, attached hereto as Exhibit 1 ("Lambert Declaration").

<sup>14/</sup> *See generally* 47 C.F.R. §§ 68.306 (d), 68.312.

<sup>15/</sup> *See* 47 C.F.R. § 68.104 (requiring that all jacks conform to subpart F of Part 68).

Moreover, the risk of noncompliance for equipment subject to Part 68 is far less than the risk of noncompliance for equipment currently authorized via the DoC process. Personal computer equipment, for instance, currently authorized by the DoC method, is constantly undergoing substantial modification that can affect radio frequency emissions and can function without being compliant. Unlike personal computer equipment, terminal equipment that does not comply with Part 68 will not connect to the network or function properly. Because the DoC is already being used for equipment with a higher risk of noncompliance, the Commission should reconsider its tentative conclusion to maintain its current certification procedures for equipment with low compliance risks.

The DoC has proven to be an effective method of ensuring compliance without imposing undue burdens on manufacturers. Cisco is unaware of any significant violations of the equipment rules by manufacturers operating under the DoC regime, and there is no evidence of any adverse effect on compliance.<sup>16/</sup> Thus, the DoC regime has met the Commission's legitimate compliance goals.

Equally important, the DoC regime has benefited manufacturers, including Cisco. The DoC largely eliminates compliance-related delays in bringing products to market.<sup>17/</sup> As product cycles become shorter and shorter, elimination of such delays is critical. Indeed, the DoC regime creates a positive incentive to address compliance concerns early in the development of a product, rather than at the end, to minimize delays. As the Commission recognized in its

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<sup>16/</sup> See Lambert Declaration, ¶ 3.

<sup>17/</sup> *Id.* ¶ 4.

*Equipment Authorization Order*, "the public interest is best served by eliminating the unnecessary delays and higher costs of marketing equipment caused by overly burdensome regulations." Accordingly, the Commission should expand the applicability of the DoC to additional types of equipment now subject to authorization requirements and, in particular to Part 68 terminal equipment.

**IV. THE PUBLIC INTEREST REQUIRES THAT THE COMMISSION MAINTAIN ITS CERTIFICATION AND REGISTRATION RESPONSIBILITIES.**

**A. The Commission Should Not Replace the Current Authorization Regime.**

As discussed above, the Commission can best reduce regulatory burdens by expanding the applicability of the DoC to additional classes of equipment. However, should the Commission retain its certification requirements, the public interest requires that the Commission maintain responsibility for certification and registration of such equipment. The Commission should not adopt the TCB regime proposed in the Notice and, if it does adopt the proposal, must retain its own equipment authorization capabilities.

The Commission should maintain its responsibility for certification and registration of equipment for several reasons. The existing regulatory regime provides an effective and efficient process for obtaining authorizations. The Commission has well-developed expertise in equipment certification and registration matters and plainly is in the best position to interpret the certification and registration rules. This expertise allows the Commission to act promptly and

authoritatively on manufacturers' applications. Moreover, its expertise allows the Commission to address unusual certification or registration requests.<sup>18/</sup>

Replacing the current regime with a certification and registration performed solely by unsupervised private parties may taint the authorization process with partiality. Although the Commission will require that TCBs be knowledgeable and impartial, the Commission cannot ensure that these requirements will be met without closely supervising TCB operations.<sup>19/</sup> Continuing the current regime will avoid the possibility that bias or incompetence will prevent a manufacturer from bringing a product to market.

Indeed, previous Commission decisions to delegate certification responsibilities to private parties have resulted in complaints to the Commission. For instance, in its *Frequency Coordination Proceeding* for private land mobile radio services, the Commission proposed and made private parties solely responsible for frequency coordination.<sup>20/</sup> The Commission created frequency coordinators to review private land mobile applications prior to their submission to the Commission.<sup>21/</sup> Subsequently, the Commission received complaints about frequency coordinators, alleging bias and preferential treatment in the coordination process.<sup>22/</sup> Similarly,

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<sup>18/</sup> Indeed, the Commission staff has reviewed so many applications that "unusual" applications often can be addressed as if they are routine.

<sup>19/</sup> See Notice, ¶ 12 (proposing a requirement that TCBs be impartial).

<sup>20/</sup> See Frequency Coordination in the Private Land Mobile Radio Services, Report and Order, 103 F.C.C. 2d 1093 (1986), *order on reconsideration*, 61 Rad Reg. 2d (P&F) 148 (1986).

<sup>21/</sup> 103 F.C.C. 2d at 1094.

<sup>22/</sup> See, e.g., Electrical Engineering Company and PageMart II, Inc. Requests for Exclusivity on 929.7625 MHz, 12 FCC Rcd 3819 (1997); see also Petition for Reconsideration

the Commission's current TCB proposal will undoubtedly generate complaints to the Commission, thereby offsetting the administrative efficiencies of private party certification.

**B. The Commission's Proposal to Have TCBs Perform Audits Is Unworkable.**

Cisco also is concerned about the Commission's proposal to require TCBs to perform audits. In the Notice, the Commission tentatively concludes that TCBs should "periodically perform audits of equipment on the market that they have certified to ensure continued compliance."<sup>23/</sup> This proposal is problematic for several reasons.

First, an audit done by a TCB would be unreliable. Under the proposed rules, a manufacturer could have equipment initially approved by one TCB and then have modifications to that equipment approved by another TCB. If the first TCB were unaware of the second certification, the audit done by the first TCB might list the modification as a violation. Thus, an audit by the first entity could reveal "phantom" violations.

Also, because the audit function is closely tied to enforcement, a bifurcated audit/enforcement approach would create conflicts of interest for the TCBs involved. According to the Notice, TCBs would be required to conduct audits, but the Commission would retain its enforcement authority.<sup>24/</sup> If this proposal is adopted, TCBs will have incentives both to intentionally overlook violations by loyal customers and to seek out violations by customers who

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of Responses to Requests for Declaratory Rulings, 8 FCC Rcd 8398 (1993) (discussing allegations of improprieties concerning frequency coordination procedures).

<sup>23/</sup> Notice, ¶ 17.

<sup>24/</sup> See *id.* ¶¶ 12, 18 (explaining that TCBs may *not* take enforcement action and must refer to the Commission any matters of noncompliance).

later use competitive services. In addition, a TCB would have strong incentives to ensure that an audit does not reveal any wrongdoing or errors by the TCB. Thus, it would be difficult for the Commission to trust audit results from TCBs.

Moreover, TCBs will be inclined to ignore the audit requirement because audits are costly and burdensome. For these reasons, TCBs may choose not to audit, creating a gap in enforcement procedures. Accordingly, the Commission should retain all enforcement functions, including post-market surveillance.

**C. If the Commission Adopts Its Proposal to Permit Certification and Registration by TCBs, the Commission Should Maintain Its Current Certification and Registration Process.**

As shown above, there are significant reasons to reject the proposal to permit TCBs to perform equipment authorization functions. If the Commission nevertheless permits certification and registration by TCBs, the Commission must maintain the existing certification and registration process as an option for equipment approval, as proposed in the Notice.<sup>25/</sup> Indeed, TCBs should never become the sole option for approval of equipment that currently requires approval under the rules.<sup>26/</sup>

Commission involvement is necessary to handle applications containing novel or unusual issues. As the Commission acknowledged in the Notice, it would be inappropriate for TCBs to consider applications addressing novel issues.<sup>27/</sup> These issues not only require the Commission's

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<sup>25/</sup> *Id.* ¶ 20.

<sup>26/</sup> *Id.*

<sup>27/</sup> *Id.* ¶ 18.

expertise, but also cannot be addressed by private entities that are not empowered to interpret either the Commission's regulations or the underlying statutory requirements.<sup>28/</sup> Because the Commission will be the final arbiter of equipment authorization disputes, retaining operational expertise in dealing with applications also will not result in unnecessary duplication of functions.<sup>29/</sup>

Maintaining the Commission's participation in the process also will create a competitive standard or benchmark for TCBs. The Commission's performance will provide a baseline for TCBs, thereby forcing TCBs to offer quality and prices competitive to what is provided by the Commission. TCBs will be less inclined to charge exorbitant fees for certification or registration activities if manufacturers have the option of using the Commission's existing regimes. Furthermore, the quality of services offered by the Commission will influence the quality of services offered by TCBs, forcing TCBs to offer services comparable in quality to those now provided.

The Commission also should clarify that TCBs are not acting as preliminary certification bodies. That is, if a TCB is given the authority to issue certification, there should be no additional involvement by the Commission unless an appeal is sought by the applicant. In other words, if the Commission's proposal is adopted, TCBs must be given the same power to approve routine applications as that currently held by the Commission, but must not be the sole conduit for any application.

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<sup>28/</sup> *Id.*

<sup>29/</sup> *See id.* (stating that any decision made by a TCB would be appealable to the Commission).

**V. THE COMMISSION SHOULD ENCOURAGE MUTUAL RECOGNITION AGREEMENTS.**

In the Notice, the Commission indicated that it has participated in negotiations to develop Mutual Recognition Agreements ("MRAs") with the European community and anticipated that it would participate in additional MRAs for other areas of the world.<sup>30/</sup> The Commission concluded that MRAs are beneficial because they promote bilateral market access and international competition in the provision of communications equipment.<sup>31/</sup> Cisco agrees with these conclusions. Agreements that adopt the principles used in the European MRA will make it easier for equipment manufacturers to compete in the global marketplace, which will benefit innovative manufacturers and consumers. Moreover, MRAs will encourage the development of uniform standards, so that equipment produced in one country can be sold easily in many others. The Commission should not, however, support MRAs that require certification by any specific certification body because doing so would be contrary to the Commission's goal of promoting choice. In fact, the guiding principle for evaluating MRAs should be whether they expand the options available to equipment manufacturers.

**VI. THE COMMISSION SHOULD CONTINUE TO SUPPORT AND DEVELOP ELECTRONIC FILING METHODS.**

In its *Equipment Authorization Order*, the Commission adopted an electronic filing system for many equipment authorization applications and will require all equipment

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<sup>30/</sup> See *id.* ¶¶ 25, 36.

<sup>31/</sup> *Id.* ¶ 27.



authorizations applications to be filed electronically in the near future.<sup>32/</sup> The Commission reasoned that an electronic filing system would significantly reduce the processing time of authorization applications and would permit administrative and technical reviews to be done simultaneously.<sup>33/</sup>

Cisco supports the Commission's initiative to implement an electronic filing system and encourages the Commission to permit other authorizations by way of electronic media, such as registration of terminal equipment in accordance with Part 68. Indeed, the benefits listed by the Commission in its *Equipment Authorization Order* are equally applicable to Part 68 applications. Because the *Equipment Authorization Order* did not consider adopting electronic filing requirements for Part 68, the Commission should take this opportunity to permit electronic filing of Part 68 registration applications.

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<sup>32/</sup> See *Equipment Authorization Order*, ¶¶ 29-32 (requiring that all equipment authorization applications be filed electronically one year after the effective date of new Section 2.913 (c)).

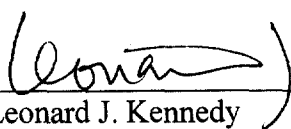
<sup>33/</sup> *Id.* ¶ 30.

## VII. CONCLUSION

For the foregoing reasons, the Commission should expand its application of the Declaration of Conformity ("DoC") to additional classes of regulated equipment, including Part 68 terminal devices. To the extent that the Commission retains its certification requirements for such equipment, the Commission must maintain full responsibility for certification and registration of such equipment and should not delegate that authority to TCBs. The Commission also should encourage participation by the United States in Mutual Recognition Agreements ("MRAs"), which promote competition in the global marketplace and increase the flexibility of manufacturers.

Respectfully submitted,

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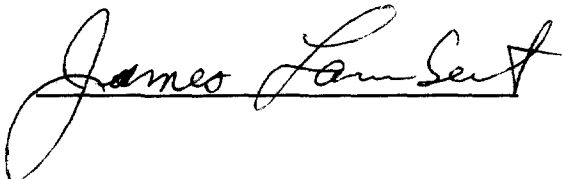
## **EXHIBIT 1**

## DECLARATION OF JAMES LAMBERT

1. My name is James Lambert. I am the Corporate Compliance Senior Manager at Cisco Systems, Inc. ("Cisco"). I have a Bachelor's degree in Physics from Virginia Commonwealth University. I have worked at Cisco for 4 years.
2. As the Corporate Compliance Senior Manager, my primary responsibilities are providing tools and infrastructure needs to internal business units in order to gain worldwide regulatory approvals of Cisco products, including overseeing the authorization of equipment manufactured and distributed by Cisco. Consequently, I am familiar with the equipment authorization requirements and procedures of the Federal Communications Commission ("FCC"). Specifically, I am responsible for ensuring that Cisco complies with the FCC's equipment authorization rules.
3. As the person responsible for ensuring that Cisco complies with the FCC's equipment authorization rules, I can attest that Cisco makes every effort to ensure compliance with the FCC's rules and has maintained an excellent compliance record. Indeed, most communications equipment manufacturers have strict compliance programs and have successfully complied with the FCC's rules.
4. Because Cisco manufactures equipment subject to Part 2, Part 15 and Part 68 of the FCC's rules, it has experience with a variety of approval methods, including certification and the Declaration of Conformity ("DoC"). Cisco believes that the DoC is a more effective and efficient compliance method because it adequately ensures compliance without causing unnecessary delays in getting equipment to market. The DoC process also permits Cisco to integrate compliance more effectively into the design process, increasing our ability to simultaneously design innovative products and meet the FCC's substantive requirements.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 23, 1998

A handwritten signature in dark ink, reading "James Lambert", written over a horizontal line.

James Lambert

## CERTIFICATE OF SERVICE

I, Constance A. Randolph, a secretary at Dow, Lohnes & Albertson, PLLC, do hereby certify that on this 27th day of July, 1998, a copy of the foregoing Comments of Cisco Systems, Inc. was sent by hand delivery to the following:

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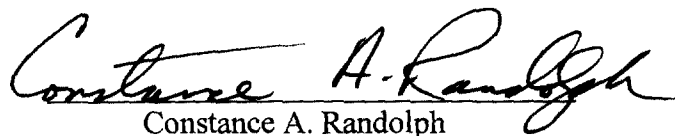
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